

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MICHAEL MCGREGOR, ZACHARY GIAMBALVO,
PAUL FELICE, MATTHEW OLIVIERI, EDWARD
NEWMAN, and DARK STORM INDUSTRIES, LLC,

Plaintiffs,

23 Civ. 1130 (GRB) (ARL)

-against-

SUFFOLK COUNTY, New York,
Police Commissioner RODNEY HARRISON,
in his Official Capacity, and Acting Superintendent
STEVEN NIGRELLI, in his Official Capacity,

**REPLY DECLARATION OF
AMY L. BELLANTONI**

Defendants.

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AMY L. BELLANTONI, declares pursuant to 28 U.S.C. § 1746 that:

1. I am the Principal of The Bellantoni Law Firm, PLLC attorneys for the plaintiffs in the above-captioned matter. I am admitted to practice law before the United States District Court for the Southern District of New York. I am also admitted to practice law before the United States District Courts for the Northern and Eastern Districts of New York and the District of Columbia, the Second Circuit Court of Appeals, the Ninth Circuit Court of Appeals, and the United States Supreme Court.

2. I have personal knowledge of the facts set forth herein based upon a review of the file maintained by my office in this matter, research, and discussions with my clients and others having personal knowledge of the facts giving rise to this litigation and the instant application. If called as a witness, I could and would testify competently to the truth of the matters set forth herein.

3. I submit this Reply Declaration in further support of Plaintiffs' motion for a preliminary and permanent injunction.

4. Attached hereto as Exhibit 1 is a true and accurate copy of the recently amended and most recent version of the Pistol License Handbook for the Suffolk County Pistol Licensing Bureau and the email from the Suffolk County Attorney's Office producing the same, with a redaction concerning an unrelated matter pending in the Eastern District.

5. Attached hereto as Exhibit 2 is a true and accurate copy of the recently amended and most recent version of the Pistol License Application Instructions for the Suffolk County Pistol Licensing Bureau and the email from the Suffolk County Attorney's Office producing the same, with a redaction concerning an unrelated matter pending in the Eastern District.

6. Attached hereto as Exhibit 3 is a true and accurate copy of "Not All History Is Created Equal: In the Post-*Bruen* World, the Critical Period for Historical Analogues is when the Second Amendment was Ratified in 1791, and not 1868", Smith, Mark W., October 1, 2022.

I declare the foregoing to be true and accurate under the penalty of perjury.

Dated: May 15, 2023

THE BELLANTONI LAW FIRM, PLLC
Attorneys for Plaintiffs

By: Amy L. Bellantoni
Amy L. Bellantoni (AB3061)
2 Overhill Road, Suite 400
Scarsdale, New York 10583
abell@bellantoni-law.com